

TAB 26

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IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

VALERIE W. WAKEFIELD : Civil Division  
Plaintiff, :  
: Civil Action  
: No. 05 CV 79 - Erie  
: VS. :  
: JOY MINING MACHINERY :  
COMPANY, a division of :  
Harnischfeger Industries :  
Defendant. : Honorable Maurice B.  
Cohill, Jr.

Deposition of : ROBERT DAHLE  
Date : September 21, 2006  
commenced at 10:25 a.m.  
Place : Franklin Club  
1341 Liberty Street  
Franklin, PA

APPEARANCES:

FOR THE PLAINTIFF:

ALEXANDER H. LINDSAY, JR., ESQ.  
The Lindsay Law Firm, P.C.  
128 South Main Street  
Butler, PA 16001

FOR THE DEFENDANT:

PAMELA G. COCHENOUR, ESQ.  
Pietragallo, Bosick & Gordon  
The Thirty-eighth Floor  
One Oxford Centre  
Pittsburgh, PA 15219

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APPEARANCES CONTINUED

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Pietragallo, Bosick & Gordon  
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NORTHWEST PENNA COURT REPORTERS  
Michell Foster  
141 N. Shenango Street  
Mercer, PA 16137

1 conversation?

2 A. Well, I didn't join it just because I heard  
3 that. I was going to say hello to these guys  
4 anyways, but what I heard was someone said my  
5 wife got a phone call and to kind of break into  
6 the group I said, oh, my wife got a couple calls  
7 many, many years ago.

8 Q. Okay.

9 A. And then a third person said, oh, yeah, that was  
10 Larry. And then the fourth person went on to  
11 talk about sports. That was it.

12 Q. Okay. Is there anything else in this statement  
13 which is not accurate?

14 A. Oh, okay. Continue. This one about some of the  
15 guys in engineering. I only have one guy say  
16 that. So it wasn't, it wasn't any, it wasn't,  
17 you know, I can't say guys. It was just one  
18 person that said that.

19 Q. Well, first of all, who was the guy that said  
20 that?

21 A. I believe that was Tom Litel (ph).

22 Q. Who?

23 A. Tom Litel.

24 Q. Litel? And what exactly did he say, if you can  
25 remember?

1 A. That's the only thing that stuck out to me.

2 Q. Dirty old man?

3 A. Yeah.

4 Q. What was the context of that statement? Why does  
5 he say that Larry Meade's a dirty old man?

6 A. I'm trying to think. This has been about that  
7 time ago. I don't recall. I mean, I know I  
8 wasn't talking about this and I don't know if I  
9 just came in and heard that in the middle of the  
10 conversation with him talking with someone else.  
11 I can't really tell you how that developed into  
12 that.

13 Q. Anything else in that?

14 A. Well, I'm not certain it happened. I wasn't,  
15 certainly wasn't there. So that's not true  
16 there. "And he believes Larry was reprimanded at  
17 that time." I don't know that happened either,  
18 did or didn't happen.

19 Q. Did you believe it?

20 A. I don't recall if I believed anything about it.

21 Q. Okay.

22 A. And I think the gal's name was Sally. It had to  
23 be probably Sally Strain. I think, yeah, Johan  
24 filled in these blanks like who they thought that  
25 girl might have been.